

Message

From: Stovern, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2C79989D003E4FC8A92A5B3BD080F961-STOVERN, MI]
Sent: 1/28/2019 7:27:47 PM
To: McMillan - CDPHE, Shannon [shannon.mcmillan@state.co.us]
Subject: RE: ? on EPA expectations for Stack Test Reporting

Hi Shannon,

Thank you for the heads up!

I had one question regarding a proposed stack test of an enclosed combustor in Weld County for compliance with NSPS OOOOa. I'll send that email to Paul and cc yourself.

Thanks again,
Mike

From: McMillan - CDPHE, Shannon <shannon.mcmillan@state.co.us>
Sent: Monday, January 28, 2019 12:23 PM
To: Stovern, Michael <Stovern.Michael@epa.gov>
Subject: Re: ? on EPA expectations for Stack Test Reporting

Thank you for the feedback Michael. I directed Jeremy to the same metrics after he copied me on the email to you. Also, as an FYI, Jeremy resigned from APCD effective yesterday. Paul Carr will be the point of contact for stack testing issues while we work towards next steps.

Welcome back and I hope the shut down wasn't a hard burden for you.

Shannon

Shannon L McMillan

Compliance and Enforcement Program Manager

Air Pollution Control Division

Colorado Department of Public Health & Environment



COLORADO

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On Mon, Jan 28, 2019 at 12:14 PM Stovern, Michael <Stovern.Michael@epa.gov> wrote:

Hi Jeremy,

I do not know of any specific SRF or CMS metric that says that 95% of test reports should have result of "Pass" or "Fail". According to our SRF guidance for round 4, we do have several metrics that are related to data reporting of stack test results:

1. Metric 2b— Accurate MDR data in ICIS-AIR (Metric is only evaluated during SRF years)

To evaluate the stack test aspect of this metric reviewers should "verify (in the DFR or ICIS-Air) that the stack test result has been entered, and any pending results have been changed to Pass or Fail within 120 days"

2. Metric 3b2 - Timely reporting of stack tests and results (Metric evaluated annually as a part of EOY report)

To evaluate this metric reviewers determine a percentage of stack tests that were reported to ICIS-Air within 120 days of the stack test.

Because of the language regarding these two metrics it seems that all the stack tests should have a result of Pass or Fail reported to ICIS within 120 day of the stack test. When I just looked at ICIS to see what stack test results options are, there are 5 options: Pass, Fail, Pending, NA or Incomplete. However, from the language in the SRF metrics it seems that each stack test needs a label of either "Pass" or "Fail" within 120 days of the stack test to be counted towards these metrics.

As always the ultimate goal is to have a perfect 100% metric score for 2b and 3b2. However, that is not realistic to require or expect perfection. When we do the End-of-Year (EOY) report and SRF reviews we take into account where the State is relative to the national average and their own history of improvement/decline in these metrics. For example the Colorado's metric 3b2 was at 91% for the 2017 End-of-Year report and far exceeded the national average of 67%.

I hope this helps! Let me know if you have any additional questions.

Thanks,

Michael Stovern

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From: Murtaugh - CDPHE, Jeremy <jeremy.murtaugh@state.co.us>

Sent: Friday, January 11, 2019 3:03 PM

To: Stovern, Michael <Stovern.Michael@epa.gov>

Cc: shannon.mcmillan@state.co.us

Subject: ? on EPA expectations for Stack Test Reporting

Michael,

I have a question I am hoping you can help me with. My question pertains to Colorado's reporting to AFS/ICIS, specifically with respect to the "Results" of stack tests we report. Since soon after I started 12 years ago, I have operated with the goal that at least 95% of the test reported should have a "Result" of Pass or Fail (no more than 5% of any other "Result", combined). In looking for the source of the 95% value, I can't find it in the SRF or in the CMS, or anywhere else.

My question is: Is there a data metric by which Colorado's compliance program is evaluated that uses the percentage of stack tests reported that have a "Result" of Pass or Fail? If so, is there a defined percentage that we are encouraged/expected/required to meet?

Thank you so much, and I hope the federal shutdown is not too hard on you. We are thinking of our federal brothers and sisters during this time.

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Jeremy Murtaugh
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